

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
  )  
v.    )     Docket No. 20-cr-10012-IT  
  )  
  )  
PAUL BATEMAN                                 )

**DEFENDANT’S ASSENTED-TO MOTION TO FILE REDACTED COPY OF  
MOTION TO RECONSIDER, AND TO FILE SUPPORTING EXHIBITS UNDER SEAL**

Now comes the defendant Paul Bateman and requests that the Court allow the defendant to file a redacted copy of his motion to reconsider the denials of his motion to suppress and motion to compel on the public docket, and to file the supporting exhibits enumerated below under seal.

In support of this motion, the defendant states that his request is consistent with ¶ 5 of the protective order approved by Magistrate Judge Hennessey in this case on February 25, 2020. [Dkt. 20]. Specifically, the defendant seeks to redact his motion to reconsider to conform with the restrictions on public filing laid out in the protective order, and to file certain exhibits under seal, all of which would refer to “sensitive” material under the protective order.

Pursuant to Local Rule 7.1, counsel conferred with the government prior to filing this motion, and understands that the government assents to this motion.

Respectfully submitted,

PAUL BATEMAN  
By His Attorney,

/s/ Sandra Gant  
Sandra Gant, B.B.O.# 680122  
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51 Sleeper Street, 5th Floor  
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CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on April 25, 2022.

/s/ Sandra Gant

Sandra Gant